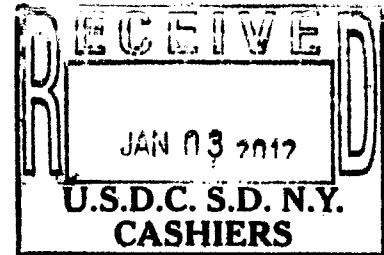


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



-----X
UTICA MUTUAL INSURANCE COMPANY,

Plaintiff,

- against -

INA REINSURANCE COMPANY,
N/K/A R&Q REINSURANCE COMPANY,

Defendant.
-----X

No.: 11-CV-8207(AKH)

**MOTION TO ADMIT WALTER J. ANDREWS, SYED S. AHMAD, AND
PATRICK M. McDERMOTT AS COUNSEL PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York and based on the Affidavit and Exhibits submitted herewith, I, Robert J. Morrow, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* to represent Plaintiff, Utica Mutual Insurance Company, of:

Applicant's Name: Walter J. Andrews
Firm Name: Hunton & Williams LLP
Address: 1751 Pinnacle Drive, Suite 1700
Tysons Corner
City/State/Zip: McLean, Virginia 22102
Phone Number: (703) 714-7400
Fax Number: (703) 714-7410
E-mail address: wandrews@hunton.com

- and -

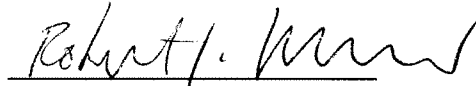
Applicant's Name: Syed S. Ahmad
Firm Name: Hunton & Williams LLP
Address: 1751 Pinnacle Drive, Suite 1700
Tysons Corner
City/State/Zip: McLean, Virginia 22102
Phone Number: (703) 714-7400
Fax Number: (703) 714-7410
E-mail address: sahmad@hunton.com

- and -

Applicant's Name: Patrick M. McDermott
Firm Name: Hunton & Williams LLP
Address: 1751 Pinnacle Drive, Suite 1700
Tysons Corner
City/State/Zip: McLean, Virginia 22102
Phone Number: (703) 714-7400
Fax Number: (703) 714-7410
E-mail address: mcdermottp@hunton.com

Dated: New York, New York
January 3, 2012

HUNTON & WILLIAMS LLP



Robert J. Morrow
200 Park Avenue
New York, New York 10166
(212) 309-1000
rmorrow@hunton.com

*Attorneys for Plaintiff,
Utica Mutual Insurance Company*

TO: John F. Finnegan, Esq.
CHADBOURNE & PARKE LLP
30 Rockefeller Plaza
New York, New York 10112
(212) 408-5100

DECLARATION OF SERVICE

Bradford C. Mulder, hereby declares under penalty of perjury, pursuant to 28 U.S.C. § 1746, that:

I am the Managing Clerk at the law firm of Hunton & Williams LLP, attorneys for Plaintiff, Utica Mutual Insurance Company.

That on January 3, 2012, I served a true copy of the attached, Notice of Motion to Admit Walter W. Andrews, Syed S. Ahmad, and Patrick M. McDermott, as Counsel, *pro hac vice*, with the accompanying Affidavit of Robert M. Morrow, with exhibits, on counsel for the Defendant, at the address listed below, via First Class Mail, by depositing the same in a duly-enclosed and sealed wrapper, with the correct postage thereon, in an official letter box duly maintained by the Government of the United States of America, within the State of New York.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 3, 2012.


Bradford C. Mulder

TO: John F. Finnegan, Esq.
Chadbourn & Parke LLP
30 Rockefeller Plaza
New York, NY 10112-0127

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
UTICA MUTUAL INSURANCE COMPANY,	:	
	:	
Plaintiff,	:	
	:	
- against -	:	No.: 11-CV-8207(AKH)
	:	
INA REINSURANCE COMPANY,	:	
N/K/A R&Q REINSURANCE COMPANY,	:	
	:	
Defendant.	:	
-----X	:	

**AFFIDAVIT OF ROBERT J. MORROW IN SUPPORT
OF PLAINTIFF'S MOTION FOR THE ADMISSION OF
WALTER J. ANDREWS, SYED S. AHMAD, AND
PATRICK M. McDERMOTT *PRO HAC VICE***

STATE OF NEW YORK)
) ss.
COUNTY OF NEW YORK)

Robert J. Morrow, being duly sworn, hereby deposes and says as follows:

1. I am a member of the bar of this Court and a Partner at Hunton & Williams LLP, attorneys for the Plaintiff, Utica Mutual Insurance Company. I submit this Affidavit pursuant to Local Rule 1.3(c) in support of Plaintiff's application for an order granting Walter J. Andrews, Syed S. Ahmad, and Patrick M. McDermott, *pro hac vice* admission to this Court to act as counsel for Plaintiff in this action.

2. Walter J. Andrews is a Partner with the law firm of Hunton & Williams LLP, located at 1751 Pinnacle Drive, Suite 1700, Tysons Corner, McLean, Virginia 22102, (703) 714-7400. He was admitted to practice in the courts of Virginia on October 30, 2000, was admitted to practice in the courts for the District of Columbia on December 13, 1982, and was admitted to practice in the courts for the state of Florida on September 27, 2010.

3. I am informed that Walter J. Andrews is a member in good standing of the Bars of the State of Virginia, the District of Columbia and the State of Florida. Annexed hereto as Exhibit 1 are Certificates of Good Standing issued by the Virginia, District of Columbia and Florida Bars. I am informed that there are no pending disciplinary proceedings against Mr. Andrews in any State or Federal court.

4. Mr. Andrews is familiar with the facts and circumstances underlying the dispute between the parties.

5. I have found Mr. Andrews to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

6. Syed S. Ahmad is a Counsel with the law firm of Hunton & Williams LLP, located at 1751 Pinnacle Drive, Suite 1700, Tysons Corner, McLean, Virginia 22102, (703) 714-7400. He was admitted to practice in the courts of Virginia on October 16, 2003, and was admitted to practice in the courts for the District of Columbia on August 8, 2005.

7. I am informed that Syed S. Ahmad is a member in good standing of the Bars of the State of Virginia and the District of Columbia. Annexed hereto as Exhibit 2 are Certificates of Good Standing issued by the Virginia and District of Columbia Bars. I am informed that there are no pending disciplinary proceedings against Mr. Ahmad in any State or Federal court.

8. Mr. Ahmad is familiar with the facts and circumstances underlying the dispute between the parties.

9. I have found Mr. Ahmad to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

10. Patrick M. McDermott is an Associate with the law firm of Hunton & Williams LLP, located at 1751 Pinnacle Drive, Suite 1700, Tysons Corner, McLean, Virginia 22102, (703) 714-7400. He was admitted to practice in the courts of Virginia on October 20, 2010.

11. I am informed that Patrick M. McDermott is a member in good standing of the Bar of the State of Virginia. Annexed hereto as Exhibit 3 is Certificate of Good Standing issued by the Virginia Bar. I am informed that there are no pending disciplinary proceedings against Mr. McDermott in any State or Federal court.

12. Mr. McDermott is familiar with the facts and circumstances underlying the dispute between the parties.

13. I have found Mr. McDermott to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

14. Accordingly, I am pleased to move the admission of Walter J. Andrews, Syed S. Ahmad, and Patrick M. McDermott on behalf of Plaintiff, Utica Mutual Insurance Company. A proposed order granting admission of Walter J. Andrews, Syed S. Ahmad, and Patrick M. McDermott, *pro hac vice*, is attached as Exhibit 4.

WHEREFORE, it is respectfully requested that the motion to admit Walter J. Andrews, Syed S. Ahmad, and Patrick M. McDermott, *pro hac vice*, to represent Plaintiff in the above captioned matter, be granted.

Dated: New York, New York
January 3, 2012


Robert J. Morrow

Sworn to and subscribed before me
this 3rd day of January, 2012


Notary Public

BRADFORD C. MULDER
Notary Public, State of New York
No. 02MU5067057
Qualified in Kings County
Certificate Filed in New York County
Commission Expires Oct. 7, 2014

EXHIBIT 1



VIRGINIA STATE BAR

CERTIFICATE OF GOOD STANDING

*THIS IS TO CERTIFY THAT WALTER JOSEPH ANDREWS IS AN ACTIVE MEMBER OF THE VIRGINIA STATE BAR
IN GOOD STANDING. MR. ANDREWS WAS LICENSED TO PRACTICE LAW IN VIRGINIA ON OCTOBER 30, 2000,
AFTER ADMISSION ON MOTION THROUGH THE SUPREME COURT OF VIRGINIA.*

Issued December 14, 2011

KAREN A. GOULD
EXECUTIVE DIRECTOR AND
CHIEF OPERATING OFFICER



District of Columbia Court of Appeals
Committee on Admissions
430 E Street, N.W. — Room 123
Washington, D. C. 20001
202 / 879-2710

I, JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals, do hereby certify that

WALTER J. ANDREWS

was on the 13TH *day of* DECEMBER, 1982

duly qualified and admitted as an attorney and counselor entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on December 20, 2011.

JULIO A. CASTILLO
Clerk of the Court

By: *Christopher C. Dip*
Deputy Clerk



The Florida Bar

JOHN F. HARKNESS, JR.
EXECUTIVE DIRECTOR

651 EAST JEFFERSON STREET
TALLAHASSEE, FLORIDA 32399-2300

850/561-5600
WWW.FLORIDABAR.ORG

State of Florida)

County of Leon)

In Re: 84863
Walter Joseph Andrews
Hunton & Williams, LLP
1751 Pinnacle Dr., Ste. 1700
McLean, VA

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on September 27, 2010.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is an active member of The Florida Bar in good standing.

Dated this 20th day of December, 2011.

A handwritten signature in black ink that reads "Willie Mae Shepherd". The signature is fluid and cursive.

Willie Mae Shepherd
Supervisor, Membership Records
The Florida Bar

WMS/ssT1:R10

EXHIBIT 2



VIRGINIA STATE BAR

CERTIFICATE OF GOOD STANDING

*THIS IS TO CERTIFY THAT SYED SALMAN AHMAD IS AN ACTIVE MEMBER OF THE VIRGINIA STATE BAR IN
GOOD STANDING. MR. AHMAD WAS LICENSED TO PRACTICE LAW IN VIRGINIA ON **OCTOBER 16, 2003**, AFTER
SUCCESSFULLY PASSING THE BAR EXAMINATION GIVEN BY THE VIRGINIA BOARD OF BAR EXAMINERS.*

Issued December 14, 2011

KAREN A. GOULD
EXECUTIVE DIRECTOR AND
CHIEF OPERATING OFFICER



District of Columbia Court of Appeals
Committee on Admissions
430 F Street, N.W. — Room 123
Washington, D. C. 20001
202 / 879-2710

I, JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals, do hereby certify that

SYED S. AHMAD

was on the 8TH day of AUGUST, 2005

duly qualified and admitted as an attorney and counselor entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on December 29, 2011.

JULIO A. CASTILLO
Clerk of the Court

By: *Christopher C. Dip*
Deputy Clerk

EXHIBIT 3



VIRGINIA STATE BAR

CERTIFICATE OF GOOD STANDING

THIS IS TO CERTIFY THAT **PATRICK MILLER McDERMOTT** IS AN ACTIVE MEMBER OF THE VIRGINIA STATE BAR IN GOOD STANDING. **MR. McDERMOTT** WAS LICENSED TO PRACTICE LAW IN VIRGINIA ON **OCTOBER 20, 2010**, AFTER SUCCESSFULLY PASSING THE BAR EXAMINATION GIVEN BY THE VIRGINIA BOARD OF BAR EXAMINERS.

Issued December 14, 2011

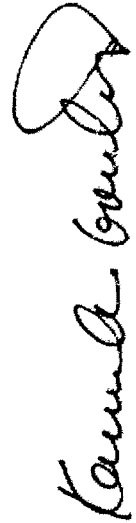

KAREN A. GOULD
EXECUTIVE DIRECTOR AND
CHIEF OPERATING OFFICER

EXHIBIT 4

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
UTICA MUTUAL INSURANCE COMPANY,	:	
	:	
Plaintiff,	:	
	:	
- against -	:	No.: 11-CV-8207(AKH)
	:	
INA REINSURANCE COMPANY,	:	
N/K/A R&Q REINSURANCE COMPANY,	:	
	:	
Defendant.	:	
-----X	:	

**ORDER FOR ADMISSION OF WALTER J. ANDREWS, SYED S. AHMAD,
AND PATRICK M. McDERMOTT *PRO HAC VICE* ON WRITTEN MOTION**

Upon the motion of Robert J. Morrow, attorney for Plaintiff, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that:

Applicant's Name:	Walter J. Andrews
Firm Name:	Hunton & Williams LLP
Address:	1751 Pinnacle Drive, Suite 1700
	Tysons Corner
City/State/Zip:	McLean, Virginia 22102
Phone Number:	(703) 714-7400
Fax Number:	(703) 714-7410
E-mail address:	wandrews@hunton.com

- and -

Applicant's Name:	Syed S. Ahmad
Firm Name:	Hunton & Williams LLP
Address:	1751 Pinnacle Drive, Suite 1700
	Tysons Corner
City/State/Zip:	McLean, Virginia 22102
Phone Number:	(703) 714-7400
Fax Number:	(703) 714-7410
E-mail address:	sahmad@hunton.com

- and -

Applicant's Name: Patrick M. McDermott
Firm Name: Hunton & Williams LLP
Address: 1751 Pinnacle Drive, Suite 1700
Tysons Corner
City/State/Zip: McLean, Virginia 22102
Phone Number: (703) 714-7400
Fax Number: (703) 714-7410
E-mail address: mcdermottp@hunton.com

are admitted to practice *pro hac vice* as counsel for Plaintiff, in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: _____
New York, New York

U.S.D.J.